



MEMO ENDORSED

U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

January 12, 2023

By ECF

Hon. Kenneth M. Karas
United States Courthouse
300 Quarropas Street, Room 533
White Plains, New York 10601

Re: *Krandle v. Refuah Health Ctr., Inc.*, 22 CV 4977 (KMK);
Esposito v. Refuah Health Ctr., Inc., 22 CV 5039 (KMK)

Dear Judge Karas:

Before the Court are two actions removed by defendant Refuah Health Center ("Refuah") from New York Supreme Court. The underlying actions concern the theft of medical and other sensitive personal information in the possession of Refuah. This data breach occurred because Refuah allegedly failed to put in place adequate cybersecurity measures. Plaintiffs have asserted causes of action under New York law. The United States is scheduled to file a statement by January 16, setting forth its position on whether Refuah meets the requirements of the above removal statutes. I write to request that this deadline be extended to January 27. The request is being made because I unexpectedly will be traveling out of state to attend to the health needs of a family member.

I thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Brandon Cowart
BRANDON H. COWART
Assistant United States Attorney
Telephone: (212) 637-2693
Email: brandon.cowart@usdoj.gov

cc: All Parties (by ECF)

SO ORDERED


KENNETH M. KARAS U.S.D.J.

1/13/23